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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,)
12 Plaintiff,) CASE NO. 2:19-CR-000222-KJD-BNW
13 vs.)
14 LANCE K. BRADFORD,)
15 Defendant,)

**STIPULATION AND ORDER TO ALLOW DEFENDANT BRADFORD
TO OBTAIN A PASSPORT AND TRAVEL**

18 IT IS HEREBY STIPULATED and AGREED by and between the United States of America,
19 by and through NICHOLAS TRUTANICH, United States Attorney, and STEVEN W. MYHRE,
20 Assistant United States Attorney, and Defendant LANCE K. BRADFORD, by and through his
21 counsel, RUSSELL E. MARSH, ESQUIRE, that the conditions of Mr. Bradford's Pretrial Release
22 be modified to allow him to obtain his passport and travel to Mexico for up to one week in late
23 October 2020.

24 1. On September 3, 2019, Mr. Bradford appeared pursuant to a Summons, and was
25 released on a PR Bond. (ECF No.7). Mr. Bradford was ordered to surrender his passport and his
26 travel was restricted to the continental U.S. unless approved by Pretrial Services (*Id.* at 3).

27 2, Mr. Bradford appeared for arraignment on a Superseding Indictment on September
28 9, 2010. (ECF No. 37.) Mr. Bradford's trial in this matter is currently set for November 16, 2020
(ECF No. 17), though the parties will be submitting a stipulation to continue the trial date to 2021.

1 3. Mr. Bradford would like to travel to Mexico for business purposes during October
2 2020. He currently plans to travel between October 21-28, 2020. He will need to retrieve his passport
3 to travel out of the United States.

4 4. The parties agree that the conditions of Mr. Bradford's pretrial release be modified
5 to allow him to obtain his passport and travel. Mr. Bradford is currently scheduled to travel from
6 October 21-28, 2020. Mr. Bradford requests access to his passport for those dates. He will return
7 the passport to U.S. Pretrial Services when he returns to the United States.

8 5. Pretrial Services agrees with these changes in Mr. Bradford's conditions of release.
9 Mr. Bradford's Pretrial Services Officer Jessie Moorehead has reviewed and does not oppose this
10 stipulation and Order. Pretrial Services approves the proposed travel.

11 6. The parties agree that all other conditions of Mr. Bradford's release will remain in
12 full force and effect.

13 Dated this 16th day of October, 2020.

Respectfully submitted,

15 WRIGHT MARSH & LEVY

NICHOLAS TRUTANICH
UNITED STATES ATTORNEY

17 BY /s/ Russell E. Marsh
18 RUSSELL E. MARSH
Attorneys for Defendant Bradford

BY /s/ Steven W. Myhre
STEVEN W. MYHRE
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
LANCE K. BRADFORD,)
Defendant,)
)
CASE NO. 2:19-CR-00022-KJD-BNW

ORDER

Based on the Stipulation between the Defendant, Lance K. Bradford, and the Government,
through counsel, and good cause appearing,

13 **IT IS HEREBY ORDERED** that the conditions of Defendant Bradford's pretrial release
14 be modified as follows:

1. Mr. Bradford may travel to Mexico for up to one week in October 2020.
 2. Mr. Bradford will obtain his passport from U.S. Pretrial Services within one week prior to his travel. U.S. Pretrial Services will provide the passport to him for the purpose of this travel. Mr. Bradford will provide his passport to Pretrial Services within two business days of his return to the United States.
 3. All other conditions of Pretrial Supervision remain in effect.

IT IS SO ORDERED.

Dated: October 16, 2020.

Elayna J. Youschah
ELAYNA J. YOUSCHAH
UNITED STATES MAGISTRATE JUDGE